
Ariel Reinitz <Ariel.Reinitz@fisherbroyles.com>

Wed, Oct 27, 2021 at 10:38 AM

To: Simcha Schonfeld <sds@kandsllp.com>

Cc: Shira Goldman Moyal <shira@kandsllp.com>, Jacob Schindelheim <jjs@kandsllp.com>, "info@kandsllp.com" <info@kandsllp.com>

Good morning Counsel – we were informed by the court reporter (Veritext) that you “are not aware of” the 30(b)(6) deposition of Goldmont Realty Corp., currently scheduled for tomorrow (Oct. 28, 2021).

Can you confirm you did not receive the below emails, including the attached notice of deposition first sent on Oct. 13? I did not receive any ‘bounce’ notifications indicating the emails were not received by your server.

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 **GG_Goldmont - Notice of Deposition (Goldmont).pdf**

Jacob Schindelheim <jjs@kandsllp.com>

Wed, Oct 27, 2021 at 12:08 PM

To: Ariel Reinitz <Ariel.Reinitz@fisherbroyles.com>

Cc: Shira Goldman Moyal <shira@kandsllp.com>, Simcha Schonfeld <sds@kandsllp.com>

Ariel,

We are available to meet and confer on Monday, please propose some times that work for you or propose dates later in the week if Monday is no good for you. The deposition cannot proceed until we meet and confer.

Best,

Jake

[Quoted text hidden]

Ariel Reinitz <Ariel.Reinitz@fisherbroyles.com>

Wed, Oct 27, 2021 at 12:32 PM

To: Jacob Schindelheim <jjs@kandsllp.com>

Cc: Shira Goldman Moyal <shira@kandsllp.com>, Simcha Schonfeld <sds@kandsllp.com>

Thank you. We've been trying to confer with you for two weeks now (as required) but received no response. Can you confirm Defendants did not receive the attached notice?

Re: conferring on Monday (Nov. 1), fact discovery is set to close the same day. See ECF No. 66. I am available to confer today until 3pm or tomorrow morning at 8am or 9am. Unless the discovery cutoff is extended (which we do not oppose), the deposition must proceed tomorrow. The link for the deposition (conducted remotely via Zoom) is below.

<https://proceedings.veritext.com/?token=24caa77bbdf9fa16b1ae465d3ca28bb9>

Thanks,

Ariel

Ariel Reinitz

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GG_Goldmont - Notice of Deposition (Goldmont).pdf
145K

Jacob Schindelheim <jjs@kandsllp.com>

Wed, Oct 27, 2021 at 3:42 PM

To: Ariel Reinitz <ariel.reinitz@fisherbroyles.com>

Cc: Shira Goldman Moyal <shira@kandsllp.com>, Simcha Schonfeld <sds@kandsllp.com>

At the risk of sounding redundant (because you asked again), we are available to meet and confer beginning Monday. There will be no deposition held in this case tomorrow.

If you fail to advise the reporter that you apparently ordered accordingly, you can bear the cost of that frivolity.

[Quoted text hidden]

Ariel Reinitz <ariel.reinitz@fisherbroyles.com>

Thu, Oct 28, 2021 at 9:26 AM

To: Jacob Schindelheim <jjs@kandsllp.com>

Cc: Shira Goldman Moyal <shira@kandsllp.com>, Simcha Schonfeld <sds@kandsllp.com>

Thank you for confirming. We advised the reporter accordingly.

I am available to confer before 2pm on Monday. But as of now discovery is also set to close on Monday. Will Defendants attend to extending the discovery cutoff?

[Quoted text hidden]

Ariel Reinitz <ariel.reinitz@fisherbroyles.com>

Fri, Oct 29, 2021 at 8:24 AM

To: Jacob Schindelheim <jjs@kandsllp.com>

Cc: Shira Goldman Moyal <shira@kandsllp.com>, Simcha Schonfeld <sds@kandsllp.com>

Good morning counsel – please let me know when on Monday you would like to confer re: Goldmont's 30(b)(6) deposition (I'm available anytime before 2pm).

Given the upcoming discovery cutoff and the various outstanding discovery items outstanding (including as referenced below), we plan to ask the Court to extend the deadline to Dec. 31, 2021. Please advise if you consent.

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 **GG_Goldmont - Notice of Deposition (Goldmont).pdf**
145K

Jacob Schindelheim <jjs@kandsllp.com>

Fri, Oct 29, 2021 at 12:39 PM

To: Ariel Reinitz <Ariel.Reinitz@fisherbroyles.com>

Cc: Shira Goldman Moyal <shira@kandsllp.com>, Simcha Schonfeld <sds@kandsllp.com>

How about noon on Monday for the meet and confer?

We consent to the proposed extension of the fact discovery deadline.

[Quoted text hidden]

Ariel Reinitz <Ariel.Reinitz@fisherbroyles.com>

Fri, Oct 29, 2021 at 2:23 PM

To: Jacob Schindelheim <jjs@kandsllp.com>

Cc: Shira Goldman Moyal <shira@kandsllp.com>, Simcha Schonfeld <sds@kandsllp.com>

Monday at noon works. Please provide the best number to reach you and I will call you then.

I will put in a letter to the Court requesting extension of the fact discovery deadline and indicate Defendants consent to the extension.

[Quoted text hidden]

Jacob Schindelheim <jjs@kandsllp.com>

Mon, Nov 1, 2021 at 10:53 AM

To: Ariel Reinitz <Ariel.Reinitz@fisherbroyles.com>

Cc: Shira Goldman Moyal <shira@kandsllp.com>, Simcha Schonfeld <sds@kandsllp.com>

212-857-4480.

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Ariel Reinitz <Ariel.Reinitz@fisherbroyles.com>

Mon, Nov 1, 2021 at 12:25 PM

To: Jacob Schindelheim <jjs@kandsllp.com>

Cc: Shira Goldman Moyal <shira@kandsllp.com>, Simcha Schonfeld <sds@kandsllp.com>

Jacob – as just discussed, by the end of this week Defendants will come back to us with proposed dates for their 30(b)(6) deposition. Defendants did not raise concerns re: the topic list provided in the deposition notice. Defendants are in receipt of the our document requests relating to the depositions of Leon and Abi Goldenberg and will respond to these requests shortly.

If I missed anything, please let me know.

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